REMARKS

Reconsideration and allowance of the present application are respectively requested. Claims 1 and 3-7 remain pending in the application. Claim 2 has been canceled by the present amendment, and claims 8-15 were previously canceled.

The previous rejections set forth by the Examiner were reviewed by the U.S. Patent Office Board of Patent Appeals, and a Decision was rendered on September 22, 2006. The opinion sustained the Examiner's rejection of claim 1, but did not sustain the rejection of dependent claim 2. The last paragraph on page 6 of the Board's Decision acknowledges that claim 2 is neither taught nor suggested by the documents relied upon by the Examiner. By the foregoing amendment, independent claim 1 has been rewritten to include features of claim 2, such that independent claim 1, along with all claims which depend therefrom, are allowable.

The previous Office Action sets forth the following two grounds of rejection: the rejection of claims 1-3, and 5-7 under 35 U.S.C. § 103, as being unpatentable over the Holt, III patent (US 6,324,565, hereinafter, "Holt") in view of the Smith et al. patent (US 6,377,991, hereinafter, "Smith"); and the rejection of claim 4 under 35 U.S.C. § 103, as being unpatentable over the Holt, III patent in view of the Smith et al. patent in further view of the Aggarwal et al. patent (US 6,012,126, hereinafter "Aggarwal").

As presently disclosed, a subscription manager generates a subscription list that specifies all of the subscribed proxy servers that cache the content file when the subscription manager is notified by each of the proxy servers that it has cached the content file. The system of maintaining content consistency also includes a consistency manager in the content server for notifying all of so subscribed proxy

servers that cache the content file when the content file is updated in the content server to discard the cached content file from those proxy servers.

For instance, referring the Figure 2, a data access network system 100 is illustrated for implementing a content consistency scheme in accordance with exemplary embodiments. Content servers in a master data service system 30 store content files that can be accessed by remote proxy data service systems, such as proxy data service system 32. An exemplary data access network system 100 can include a number of master data service systems 30 and proxy service data systems 32.

A subscription manager 40 is provided in the master data service system 30 to specify all proxy servers, such as proxy data service system 32, that consistently cache the content file and that are subscribed to the cached content file. The content consistency scheme of Figure 2 employs a consistency manager 41 to enforce the content consistency scheme. When content of the content file is updated, deleted, or changed in the content servers of the master data service system 30, the consistency manager 41 notifies those proxy data service systems 32 which are subscribed to the content file to discard the cached content file.

The subscription manager generates a subscription list that specifies all of the subscribed proxy servers that cache the content file when the subscription manager is notified by each of the proxy servers that it has cached the content file. As described in the last paragraph on specification page 17, when content is retrieved from the master data service system 30 and cached in proxy data service system 32, a subscription manager 51 can determine if content consistency needs to be applied to the cached content file. If so, subscription manager 51 sends a subscription request to subscription manager 40 of the master data system 30. Subscription

manager 40 can acknowledge the request and add the request to the subscription list maintained by the subscription manager 40 for the cached content file.

As noted by the Board, none of the documents relied upon by the Examiner, considered individually or in the combination suggested by the Examiner, teach or suggest Applicants' amended claim 1 combination. There would have been no motivation or suggestion that would have led one of ordinary skill to the combination of the Smith and Holt documents in the manner suggested by the Examiner. Moreover, even if one were to consider, *arguendo*, that these documents could have been combined in the manner suggested by the Examiner, such combination would not have resulted in the presently claimed invention. Smith's membership list is a list of all proxy servers in an organization. At best, any combination of these teachings would have resulted in using Smith's membership list *in each proxy server* of the entire array of servers in an organization in Holt's broadcast scheme. Neither of these documents, alone or in combination, teach or suggest Applicants' claim 1 combination which includes, among other features, a subscription manager *in the content server* for specifying all of the proxy servers *that are subscribed to a content file* stored in the content server, wherein the subscription manager generates a subscription list that specifies all of the subscribed proxy servers that cache the content file when the subscription manager is notified by each of the proxy servers that it has cached the content file/.

Thus, independent claim 1 is allowable. Claims 3-7, which depend from claim 1 and which recite additional advantageous features, are also considered allowable.

All objections and rejections raised in the previous Office Action having been addressed, taking into consideration the Decision of the U.S. Patent Office Board,

the present application is considered to be in condition for allowance and a Notice of

Allowance is respectfully solicited

Respectfully submitted,
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